

APPENDIX 2
INSIGNIFICANT ACTIVITY UNIT INFORMATION FORM

Section 1 - List All Emission Units that are Insignificant Activities Pursuant to NAC 445B.288.2(a) through (h) (see Attachment 2 for regulation).

Emission Unit	Exemption Regulation (Example - NAC 445B.288.2(b))	Reason Exemption Applies
No. 2 Fuel Oil Storage Tank (~4000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Gasoline Storage Tank (~1000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Used Oil Storage Tank (~1000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
No. 2 Fuel Oil Storage Tank-FWP Engine (~300 gallons)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Lube Oil Storage Tank (~14,000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Lube Oil Storage Tank (~3000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Lube Oil Storage Tank (~14,000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons
Lube Oil Storage Tank (~3000 gallon capacity)	NAC 445B.288(2)(d)	Storage tank capacity less than 40,000 gallons

Section 2 - List All Emission Units Proposed as Insignificant Activities Pursuant to List Approved by the Director (see Attachment 1 - List of Approved Insignificant Activities)

Emission Unit	Reason Exemption Applies
Safety Kleen or equivalent parts cleaner	Satisfies "parts cleaners – cold cleaning only" as approved by Director

Section 3 - List All Emission Units Proposed as Insignificant Activities and Not Otherwise Listed in Section 1 or Section 2 (NAC 445B.288.4). Proposed insignificant activities from this Section must be submitted, under separate cover, to the Director for his approval. The submittal must include a sufficient description of the emission unit(s), all emissions calculations, and references.

Vehicle fueling operations

Section 4 -Emissions Calculations - Insignificant Emission Units/Activities

Emissions calculations for each insignificant activity listed in Sections 1 through 3 above must be provided and included in Appendix 4. Emissions calculations must be based on the maximum design throughput, maximum design production rate or maximum design heat input rate value of the emission unit or activity. No consideration for emissions reduction from pollution controls or limits on the hours of operation or other operational constraints may be allowed unless otherwise approved by the Director or as indicated in NAC 445B.288.3 or on the list provided in Attachment 1.

**TOQUOP ENERGY PROJECT
PRESUMED TRIVIAL ACTIVITIES LIST**

The following types of activities and emission units may be presumptively omitted from Class I applications. Certain of these listed activities include qualifying statements intended to exclude many similar activities. Trivial activities are emission units without specific applicable requirements under Title V of the Clean Air Act Amendments of 1990 and with extremely small emissions. There are also no applicable State Implementation Plan requirements for these activities. As of June 12, 1998, cooling towers have been removed from this list and must be treated as a permitted item or insignificant activity.

- Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources
- Air-conditioning units used for human comfort that do not have applicable requirements under Title VI of the CAA
- Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process
- Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction
- Janitorial services and consumer use of janitorial products
- Internal combustion engines used for landscaping purposes
- Bathroom/toilet vent emissions
- Tobacco smoking rooms and areas
- Facility maintenance and upkeep activities (e.g., groundskeeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification¹
- Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or degreasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification
- Portable electrical generators that can be moved by hand from one location to another. (NOTE: "Moved by hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device)
- Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic
- Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals¹
- Air compressors and pneumatically operated equipment, including hand tools

¹Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production level thresholds.

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- Batteries and battery charging stations, except at battery manufacturing plants
 - Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized
 - Equipment used to mix and package, soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized
 - Drop hammers or hydraulic presses for forging or metalworking
 - Vents from continuous emissions monitors and other analyzers
 - Natural gas pressure regulator vents, excluding venting at oil and gas production facilities
 - Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation
 - Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP
 - Consumer use of paper trimmers/binders
 - Drying ovens and autoclaves, electric or steam heated, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam
 - Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
 - Laser trimmers using dust collection to prevent fugitive emissions
 - Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents²
 - Routine calibration and maintenance of laboratory equipment or other analytical instruments
 - Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
 - Hydraulic and hydrostatic testing equipment
 - Environmental chambers not using hazardous air pollutant (HAP) gases
 - Humidity chambers
 - Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted
 - Process water filtration systems and demineralizers
 - Demineralized water tanks and demineralizer vents
 - Boiler water treatment operations, not including cooling towers
 - Oxygen scavenging (de-aeration) of water
 - Ozone generators
 - Fire suppression systems
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- Emergency road flares
 - Steam vents and safety relief valves
 - Steam leaks
 - Steam sterilizers
 - Lime slakers
 - Ro-taps (bench scale)
 - Riffles
 - Ventilated benches (sample preparation area)
 - Underground mining activities (including ventilation shafts)
 - Aspirating devices for, and venting of, aerosol cans, butane or natural gas cylinders, propane gas cylinders and ether cylinders with a capacity of less than 1 gallon
 - Vacuum truck related activities
 - Non-commercial experimental and analytical laboratory equipment which are bench scale in nature
 - Use of pesticides, fumigants and herbicides
 - Equipment using water, soap, detergents, or a suspension of abrasives in water for purposes of cleaning or finishing
 - Pump or motor oil reservoirs
 - Electric motors
 - Continuous emissions monitoring system calibration gases
 - Water treatment or storage or cooling systems for process water (specify any water additives), not including cooling towers
 - Chemical storage associated with water and wastewater treatment
 - Aerosol can usage
 - Plastic pipe and liner welding
 - Acetylene, butane and propane torches
 - Equipment used exclusively for portable steam cleaning
 - Caulking operations which are not part of a production process
 - High voltage induced corona
 - Production of hot/chilled water for on-site use not related to an industrial process
 - Filter draining
 - General vehicle maintenance and servicing activities at the source
 - Station transformers
 - Circuit breakers (non-PCB oil filled)
 - Storage cabinets for flammable products

² Many lab fume hoods or vents might qualify for treatment as insignificant or be grouped together for purposes of description.

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- Fugitive emissions from landfill operations (provided the landfill is not subject to any federal applicable requirement)
 - Automotive repair shop activities
 - Stormwater ponds
 - Blast cleaning equipment using a suspension of abrasive in water and any exhaust system or collector serving them exclusively
 - Motor vehicle wash areas, etc.
 - Open burning (provided all reporting and permitting requirements which apply are followed)
 - Fire fighting activities and training conducted at the source in preparation for fighting fires
 - Open burning activities in accordance with the NAC
 - Flares used to indicate danger
 - Pressure relief valves
 - Natural gas pressure regulator vents, excluding venting at oil and gas production facilities

ATTACHMENT 1

**LIST OF APPROVED
INSIGNIFICANT
ACTIVITIES**

NAC 445B.288.2

Insignificant Activities

The following insignificant activities have been approved by the director in accordance with NAC 445B.288.4:

?Crematory Incinerators processing <175 tons per year (1/24/96)

?Autoclave re-bricking (3/1/96)

?Prill silos <100,000 tons/year (3/1/96)

?Parts cleaners - cold cleaning only (3/1/96)

? Storage tanks, as follows: (3/1/96)

<u>Emission Unit</u>	<u>Tank size (gallons)</u>	and	<u>Vapor Pressure (PSIA)</u>
non-HAP VIL*	<40,000		<0.60
non HAP VIL	<200,000		<0.13
HAP VIL	<40,000		<0.15
HAP VIL	<200,000		<0.03
Liquid NaCN	any size		N/A

*VIL - volatile inorganic liquid

?Portable screening plant, processing 100,000 tons of metallic mineral, in less than 6 months, with 4% moisture content (3/5/96)

?Carbon strip/electrowinning circuit, with a total liquid surface area of less than 610 square feet and a solution flow rate less than 400 gallons per minute (6/12/96)

?Mine analytical laboratory fume hoods (6/12/96)

?Mine metallurgical laboratory fume hoods (6/12/96)

?Landfarming of not more than 270,000 tons per year of diesel-based hydrocarbon contaminated soil, with a concentration of less than 50,000 ppm Total Petroleum Hydrocarbons. (6/12/96)

?Landfarming of not more than 338 tons per year of gasoline-based hydrocarbon contaminated soil, with a concentration of less than 50,000 ppm Total Petroleum Hydrocarbons. (6/12/96)

?Sand washing operations, consisting of material unloading by continuous drop feed on a feed conveyor, double deck screen/wash with two feed conveyors to the materials stockpile, processing the following: (1) less than 765,000 tons per year at the following moisture contents: material unloading and conveyor belt at least 1.5% moisture, screen and tow conveyor belts at least 7.0% moisture; (2) less than 805,000 tons per year at the following moisture contents: material unloading and conveyor belt at least 1.5% moisture, screen and tow conveyor belts at least 7.5% moisture; (3) less than 844,000 tons per year at the following moisture contents: material unloading and conveyor belt at least 1.5% moisture, screen and two conveyor belts at least 8.5% moisture. (6/12/96)

?Lime silo, located at Newmont Gold Company's Rain Project, 127 ton storage capacity, equipped with silo discharge auger which is physically limited to 1.50 tons per hour of discharge of lime (13,140 tons per year). (7/13/98)

?Chemistry laboratory at the HWAD Main Base. (8/24/98)

?Transloading facility for lime, consisting of railcar transfer to screw conveyor, screw conveyor to belt conveyor, belt conveyor to truck, transferring 80 tons per hour, for Continental Lime Inc.'s Dunphy Transloading facility. (1/13/99)

?Newmont Gold Company - Shotcrete Plant described as follows: two (2) cement silo augers, cement metering bin, mix box containing washed pea gravel and sand, and auger to shotcrete transport truck. Shotcrete plant throughput is physically limited by shotcrete discharge auger, at 25.6 tons per hour (19.84 tons per hour gravel/sand and 5.76 tons per hour cement). (4/27/99) (revised 2/20/01)

- ?SmartAsh 100 disposal unit, specified as follows: 55 gallon steel open head drum, stainless steel lid, plated tubular steel frame, 2 blowers, for burning absorbent materials, paper waste, wood by-products, rags, used filters, waste oil, and other **non-hazardous** waste at a rate of 50 pounds per hour. (5/7/99)
- ?One evaporator/condenser located at Quebecor Printing Nevada's Fernley facility with a maximum design capacity of 2000 gallons per day. (11/30/99)
- ?Transloading facility for flyash, consisting of railcar transfer to screw conveyor, screw conveyor to belt conveyor, belt conveyor to truck, transferring 80 tons per hour, for Continental Lime Inc.'s Dunphy Transloading facility. (12/1/99)
- ?Battery decasing, decanning, washing and waste water treatment operations, located at NAVSEA -HWAD. Combined mercury-zinc, mercury-cadmium and silver-zinc battery process rate not to exceed 1000 batteries per hour and 260,000 batteries per year. Only one battery type may be processed at any given time. Mercury content not to exceed 0.552 pounds per battery. Total uncontrolled mercury emissions from the battery decasing, decanning, washing and wastewater treatment operations not to exceed 0.1 pounds per hour and 26 pounds per year. (5/15/2000)
- ?Crawford Animal Crematories - Model CB400 and a Model 500P to be located at the Silver Hills Vet Hospital in Carson City. The crematories are to be used for the destruction of animal carcasses only. (12/12/00)
- ?MCI WorldCom - Six Generac 96A04605-S, 60kW, diesel generators - One each at the following locations: Argenta, Lander County; Carlin, Elko County; Clover Valley, Elko County; Shafter, Elko County; Stonehouse, Humboldt County. (2/20/01)
- ?Newmont Gold Company's Portable Cement Mixing Plant consisting of - a mix tank for generating cement slurry, and an auger with a maximum throughput of 700 pounds of cement per minute. (2/20/01)
- ?Barrick Goldstrike Mines, Inc., Pilot Scale Fluidized Bed Roaster w/ Integral Quenching Eductor. Maximum material throughput of 45 pounds per hour with a roaster operating temperature range between 700° and 1200° F. (4/3/01)
- ?Industrial Metals & Mining, LLC's ore processing operation located in Silver Springs, Nevada consisting of - weigh and assaying of incoming ore, ore roasting, ore sizing, and ore loading to liquid process solution system. (8/10/01)
- ?Oglebay Norton Industrial Sands, Inc.'s portable sand transloading conveyor. (10/10/01)
- ?Paramount Nevada Asphalt Company's emulsified asphalt plant. (5/22/02)
- ?Crawford Animal Crematories, Model C500P natural-gas fired crematory, 75 pounds/hour capacity, located at Great Basin Pet Crematory in Elko. The crematory is to be used for the destruction of animal carcasses only. (10/28/02)
- ?Bently Nevada, LLC, screen printing operation, manual, processing <50 lb/hr. (12/18/02)
- ?RMC Nevada, Inc., portable aggregate stacking conveyor which will convey 50 thousand tons of washed sand with approximately 8% moisture into railcars. The conveyor is powered by a 115 h.p. engine. (1/16/03)
- ?Explosive ordnance training for crime and terrorist scene investigators (post-blast analysis) - An inoperable vehicle (battery and fluids removed) will be destroyed by explosion of 500 pounds of ammonium nitrate per event, not to exceed eight (8) events per 12 month rolling period. Activity will be conducted on a secure range closed to public access on NAS Fallon. (6/25/03)
- ?Bently Nevada, LLC, potting ovens - electric-heated, components placed in potting cups or trays and potting compound manually poured into the cups or trays. Trays of components are then placed into the potting ovens for curing. (7/24/03)
- ?Bently Nevada, LLC, transducers-related ovens - used for curing small quantities of epoxy placed on wires, cables, and electrical leads. Average temperature of each oven is 135 to 150 degrees F. (7/24/03)

?Bently Nevada, LLC, plastic mold extruders - feeding of solid plastic beads which are melted and extruded into molds. The barrel of the extruder holds 2 pounds of plastic beads, which are heated to 700 degrees F. Mold temperature is 360 degrees F. (7/24/03)

?Bently Nevada, LLC, CNC lathes and mills, using water-based coolant and oil. (7/24/03)

?Bently Nevada, LLC, conformal coating - conformal coating is the process of spraying a dielectric material onto circuit boards or components. Curing takes places in a conformal coating machine. (7/24/03)

?Bently Nevada, LLC, solder paste application/surface mount/reflow oven - approximately 0.5 gram of solder paste is applied from a 700 gram hand-held tube to each printed circuit board, then a machine wipes the solder paste over the board through a stencil. Components are then surface mounted onto the printed circuit board with a pick and place machine. The surface mounted components are then joined to the printed circuit board inside an electric-powered reflow oven. (7/24/03)

?Bently Nevada, LLC, evaporator - dirty stencils that are used for solder paste application are soaked and cleaned in a bath of water and detergent (Smart Sonic brand). (7/24/03)

?Nevada Cement Company, cooling tower, 300 gallon per minute capacity, with a maximum Total Dissolved Solids concentration of 500 ppm. (7/28/03)

?Newmont Mining Corporation, Lone Tree Mine, Process Cooling Tower (4 cells), NC7043, 3,006 gallons per minute, with a maximum Total Dissolved Solids concentration of 1,680 ppm. (9/4/03)

?Newmont Mining Corporation, Lone Tree Mine, Lube System Cooling Tower (1 cell), NC4001, 540 gallons per minute, with a maximum Total Dissolved Solids concentration of 1,100 ppm. (9/4/03)

?Newmont Mining Corporation, Lone Tree Mine, Oxygen Plant Cooling Tower, (2 cells), NC8012, 1,900 gallons per minute, with a maximum Total Dissolved Solids concentration of 1,480 ppm. (9/4/03)

?Department of the Air Force, Nellis Air Force Base, Nellis Test and Training Range, 17 fuel dispensing operations, designated as TTR1 through TTR12, FDS006 and FDS007, and FDS016 through FDS018. (10/10/03)

?Department of the Air Force, Nellis Air Force Base, Nellis Test and Training Range, 11 fuel loading operations, designated as FLD004 through FLD014. (10/10/03)

?Quebecor World, flexographic plate maker, using no more than 605 gallons per year of VOC product. (11/7/03)

?Quebecor World, five (5) evaporative cooling towers, with a combined water recirculation rate of 6,052 gallons per minute, and a maximum Total Dissolved Solids Concentration of 12,000 ppm. (11/7/03)

?Nevada Wood Preserving, cooling tower, 150 gallons per minute, with a maximum Total Dissolved Solids concentration of 24,000 ppm. (11/20/03)

?Queenstake Resources USA, Inc., three roaster cooling towers, 1,500 gallons per minute each, with a maximum Total Dissolved Solids concentration of 12,000 ppm. (12/9/03)

?Queenstake Resources USA, Inc., oxygen plant cooling tower, 2,699 gallons per minute, with a maximum Total Dissolved Solids concentration of 150 ppm. (12/9/03)

?Newmont Mining Corporation, Twin Creeks Mine, lube system cooling tower, 1,208 gallons per minute, with a maximum Total Dissolved Solids concentration of 2,170 ppm. (12/9/03)

?Newmont Mining Corporation, Twin Creeks Mine, laboratory sample reject bin, processing no more than 2 tons per hour. (12/9/03)

?Orica USA, Inc. prill transloading facility with two silos of 50,000 tons per year of throughput each located in Humboldt County, NV. Only one silo can operate at a time. (3/15/04)

?Queenstake Resources USA, Inc. portable concrete mixing plant located at the Jerritt Canyon Mine with a maximum throughput rate of 200 yd³ of concrete per hour and 60,000 yd³ of concrete per year. (5/28/04)